

**EXHIBIT**

*M. CARTER*  
*/ 8-15-07*  
*DMB*

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

VIVIAN BERT, et al.,	)	Case No. C-1-02-00467
	)	Judge Beckwith
Plaintiffs,	)	Magistrate Judge Hogan
	)	
v.	)	PLAINTIFF MARNIE CARTER'S
	)	RESPONSES TO DEFENDANT'S
AK STEEL CORPORATION,	)	FIRST REQUEST FOR THE
	)	PRODUCTION OF DOCUMENTS
Defendant.	)	
	)	

**GENERAL OBJECTIONS**

1. The Plaintiff objects to these discovery requests to the extent they seek information or documents protected from discovery and/or disclosure by the attorney/client privilege, the work product doctrine, or any other applicable privilege.
2. The Plaintiff objects to these discovery requests to the extent they seek information or documents neither material nor relevant to the claims or defenses of this action nor reasonably calculated to lead to the discovery of admissible evidence.
3. The Plaintiff objects to these discovery requests to the extent they are overly broad and/or unduly burdensome.
4. The Plaintiff objects to these discovery requests to the extent they are so vague and ambiguous as to be incapable of a definite response.
5. The Plaintiff objects to these discovery requests to the extent they seek confidential or proprietary information or documents. Notwithstanding this objection, the Plaintiff agrees to provide, if any exist, as more fully set forth below, such information or documents subject to the terms of a mutually agreeable protective order to be entered in this action.
6. The Plaintiff objects to these discovery requests to the extent they call for conclusions of law.
7. The Plaintiff objects to these discovery requests to the extent that they seek and/or require the production of documents which are not in the Plaintiff's possession, custody, or control.
8. The Plaintiff objects to the time and place of production for documents specified in these

discovery requests but state, to the extent that the documents are available, as more fully set forth below, they will be produced at a mutually convenient time and place.

9. The Plaintiff objects to the definitions and instructions in the discovery requests to the extent they seek to require the Defendant to comply with requirements beyond the scope of or impose burdens, duties and obligations in excess of or different from those imposed by applicable law and the Federal Rules of Civil Procedure.
10. The Plaintiff objects to these discovery requests to the extent they seek to discover "core" work product, including the disclosure of the mental impressions, conclusions, opinions, and/or legal theories of attorneys or other representatives of Plaintiff and/or the substance of information developed by them (i.e., interpretive, not investigatory) in preparation for the trial of this action.
11. The Plaintiff objects to these discovery requests to the extent that the information sought, if any, was obtained and prepared in anticipation of litigation, and the Plaintiff has not made the required showing of substantial need for the information or that the substantial equivalent of such information is unobtainable by other means. The Plaintiff further objects to these discovery requests to the extent that the information called for, if any, is privileged and is not discoverable under FRCP 26(b)(3) and *Hickman v. Taylor*, 329 U.S. 495 (1947).
12. The Plaintiff objects to these discovery requests to the extent that they seek information that is equally available to the Defendant, and the burden on the Defendant to obtain the requested information is no greater than the burden on the Plaintiff.
13. The Plaintiff objects to these discovery requests to the extent they seek information or documents relating to expert witnesses, witnesses, and trial exhibits in excess of the disclosure duties imposed by the Federal Rules of Civil Procedure and the Court's Orders relating to such matters.
14. The Plaintiff objects to these discovery requests to the extent that they seek information regarding matters which are not at issue in this action.
15. The Plaintiff objects to these discovery requests to the extent that they do not, on their face, restrict themselves either to an identifiable time or a reasonable, rationally-based time frame.
16. The Plaintiff objects to these discovery requests to the extent that they are oppressive, i.e., designed to create an unreasonable burden on the Plaintiff which burden is not commensurate with the professed result sought.
17. Except as otherwise indicated, the Plaintiff incorporates the General Objections into each

and every response set forth below. By responding to any of the discovery requests, the Plaintiff does not waive any of the foregoing General Objections.

Plaintiff responds to Defendant's requests for the production of the following documents:

**Request No. 1:** Produce all documents that refer to, reflect, comment on, or tend to prove or disprove any of the contentions in the Complaint or the Answer.

**Specific Objection to Request No. 1:** Plaintiff objects to the extent this request is vague, ambiguous, and overly broad. Plaintiff further objects to the extent that this request seeks information or documents protected from discovery and/or disclosure by the attorney/client privilege, the work product doctrine, or any other applicable privilege. Subject to and without waiving the foregoing general and specific objections, Plaintiff responds as follows:

**RESPONSE:** Plaintiff will produce all non-privileged responsive documents.

**Request No. 2:** Produce all documents that you believe support your claim for damages, or which reflect, comment on, or tend to prove or disprove such claims.

**Specific Objection to Request No. 2:** Plaintiff objects to the extent this request is vague, ambiguous, and overly broad. Subject to and without waiving the foregoing general and specific objections, Plaintiff responds as follows:

**RESPONSE:** Plaintiff will produce all non-privileged responsive documents.

**Request No. 3:** Produce any diary, journal, or calendar of appointments, or notes that you have maintained since January 1, 1998.

**Specific Objection to Request No. 3:** Plaintiff objects to the extent that this request is overly broad and/or unduly burdensome. Plaintiff also objects to the extent that this request seeks information that is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing general and specific objections, Plaintiff responds as follows:

**RESPONSE:** Plaintiff will produce any diary, journal, or calendar of appointments that Plaintiff has maintained since January 1, 1998 that relate to the claims or defenses in this case.

**Request No. 4:** Produce all documents provided to or obtained from Defendant.

**Specific Objection to Request No. 4:** Plaintiff objects to the extent that this request is overly broad and/or unduly burdensome. Plaintiff further objects to the extent that this request seeks information that is equally available to the Defendant, and the burden on the Defendant to obtain the requested information is no greater than the burden on the Plaintiff. Subject to and without waiving the foregoing general and specific objections, Plaintiff responds as follows:

**RESPONSE:** Plaintiff will produce all non-privileged responsive documents.

**Request No. 5:** Produce all of your medical or psychological records since January 1, 1998.

**Specific Objection to Request No. 5:** Plaintiff objects to this Request to the extent that the information sought is confidential and/or privileged.

**Request No. 6:** Produce all documents that refer to, reflect, or comment on any criminal proceeding in which in which you have been either arrested or convicted during the past 10 years.

**Specific Objection to Request No. 6:** Plaintiff objects to this Request to the extent that the information sought is confidential and/or privileged. Plaintiff further objects that the information is not reasonably calculated to lead to the discovery of admissible evidence.

**Request No. 7:** Produce your federal income tax returns and any W-2s or Form 1099s for each tax year beginning in 1999.

**Specific Objection to Request No. 7:** Plaintiff objects to this request to the extent that it is not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request to the extent the information sought is confidential and/or privileged. Subject to and without waiving the foregoing general and specific objections, Plaintiff responds as follows:

**RESPONSE:** Plaintiff will produce Plaintiff's W-2s or Form 1099s for 1999, 2000, and 2001.

**Request No. 8:** Produce any documents that you sent to or received from the EEOC, OCRC, or any other state agency with the power to investigate charges of discrimination.

**RESPONSE:** Plaintiff will produce all non-privileged responsive documents.

**Request No. 9:** Produce any resume or other listing of your qualifications for employment you have prepared or had prepared for you since January 1, 1998.

**RESPONSE:** Plaintiff will produce all non-privileged responsive documents.

**Request No. 10:** Produce any document by which you sought employment from any employer from January 1, 1998 to date.

**Specific Objection to Request No. 10:** Plaintiff objects to the extent this request is vague and ambiguous. Subject to and without waiving the foregoing general and specific objections, Plaintiff responds as follows:

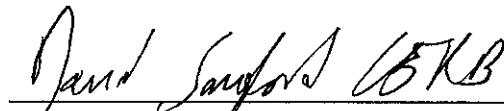
**RESPONSE:** Plaintiff will produce all non-privileged responsive documents.

**Request No. 11:** Produce any document by which you claim you requested employment from AK Steel Corporation.

**Specific Objection to Request No. 11:** Plaintiff objects to the extent this request is vague and ambiguous. Subject to and without waiving the foregoing general and specific objections, Plaintiff responds as follows:

**RESPONSE:** Plaintiff will produce all non-privileged responsive documents.

Respectfully submitted this 27<sup>th</sup> day of November, 2002.



DAVID SANFORD, D.C. Bar No. 457933  
ERIC BACHMAN, KY Bar. No. 88122  
**GORDON, SILBERMAN, WIGGINS & CHILDS, P.C.**  
7 DUPONT CIRCLE, N.W.  
SUITE 200  
WASHINGTON, D.C. 20036  
Telephone: (202) 467-4123  
Facsimile: (202) 467-4489

GRANT MORRIS, D.C. Bar No. 926253  
**LAW OFFICES OF GRANT MORRIS**  
7 DUPONT CIRCLE, N.W.  
SUITE 250  
WASHINGTON, D.C. 20036  
Telephone: (202) 331-4707

PAUL H. TOBIAS, OH Bar No. 0032415  
DAVID D. KAMMER, OH Bar No. 0061808  
**TOBIAS, KRAUS & TORCHIA, LLP**  
414 WALNUT STREET  
SUITE 911  
CINCINNATI, OH 45202  
Telephone: (513) 241-8137  
Facsimile: (513) 241-7863

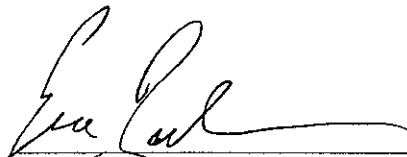
*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of Plaintiffs' Responses to Defendant's First Set of Requests for Production of Documents was served via first-class mail, postage prepaid, upon:

Lawrence J. Barty  
Patricia Anderson Pryor  
Gregory Parker Rogers  
Roger A. Weber  
TAFT, STETTINIUS & HOLLISTER LLP  
425 Walnut Street, Suite 1800  
Cincinnati, Ohio 45202-3957

This is the 27<sup>th</sup> day of November, 2002.

  
\_\_\_\_\_  
*Attorney for Plaintiffs*

## APPLICATION FOR EMPLOYMENT

## AK Steel Corporation



AK Steel Corporation is an Equal Employment Opportunity Employer and as such meets all government regulations pertaining to Equal Employment Opportunity.

Name Marnie Sanite Carter Date 10-12-01  
FIRST MIDDLE LAST

Present Address 908 8th Avon Ohio 45638  
NO. STREET CITY STATE ZIP CODE

Phone Number — or number where you can be reached: (740) 532-1733  
AREA CODE NUMBER

Permanent Address: 908 8th Avon Ohio 45638  
NO. STREET CITY STATE ZIP CODE

Permanent Phone: (740) 532-1733 Social Security # \_\_\_\_\_  
AREA CODE NUMBER

Are you 18 years of age or older? ☒ Yes ☐ No

Are you lawfully entitled to work within the U.S.? yes  
(PROOF OF CITIZENSHIP OR IMMIGRATION STATUS IS REQUIRED UPON EMPLOYMENT)

Have you been convicted of a crime other than a minor traffic violation? No

If yes, explain. \_\_\_\_\_

Date available for employment: Any time

If the job requires, are you willing to travel? Yes Relocate? No

If the job requires, are you able to work all shifts? Yes

Have you previously applied at Armco or AK Steel? No If yes, when/where? \_\_\_\_\_

Have you previously worked for Armco or AK Steel? No If yes, when/where? \_\_\_\_\_

**EXHIBIT**

## NEXT PREVIOUS POSITION

Name of employer \_\_\_\_\_ Your title \_\_\_\_\_

Address \_\_\_\_\_ Kind of business \_\_\_\_\_

Describe your position \_\_\_\_\_

Period of employment from \_\_\_\_\_ to \_\_\_\_\_ Name of person for \_\_\_\_\_ Rate of \_\_\_\_\_  
(MO/YR) (MO/YR) whom you worked earnings

Give exact reason for leaving \_\_\_\_\_

How much time have you lost from work in the past two years? \_\_\_\_\_

M. CARTER  
2 8-15-07  
DMB



**EDUCATIONAL BACKGROUND:**

Circle last grade completed 1 2 3 4 5 6 7 8 9 10 11 12

College hours completed

TYPE OF SCHOOL	NAME AND LOCATION	GRADUATED		DEGREE	FIELD OF STUDY	GRADE POINT/SCALE TOP, MID, BOT 1/3
		YES	NO			
HIGH	<i>Winton High School</i>	<i>✓</i>			<i>General</i>	<i>Middle</i>
BUSINESS OR TRADE						
COLLEGE OR UNIVERSITY						
POST GRADUATE						

List other formal educational experience; e.g., night school, home study courses, GED, etc. \_\_\_\_\_

If presently enrolled, indicate where and field of study: \_\_\_\_\_

Describe any definite plans for further study: \_\_\_\_\_

List significant activities, honors, awards or elective offices which have contributed to your career goals and interests: \_\_\_\_\_

**MILITARY SERVICE:** Are you a Veteran of the U.S. Military Service? ☐ Yes ☒ No

BRANCH OF SERVICE	HIGHEST RANK OR RATE

Please, indicate any military experience or training you feel might be of interest and value to AK Steel: \_\_\_\_\_

NAME	ADDRESS	TELEPHONE NO.	RELATIONSHIP
<i>Willa Mae Royal</i>	<i>906 8th St. Winton, OH</i>	<i>(740) 532-8529</i>	<i>Neighbor</i>
<i>Myra Carter</i>	<i>809 9th St. Winton, OH</i>	<i>(740) 532-8334</i>	<i>Cousin</i>
<i>Sue Birchfield</i>	<i>814 Adams St. Winton, OH</i>	<i>(740) 532-0577</i>	<i>friend</i>

I hereby certify that the foregoing information is accurate, and I authorize AK Steel to verify it. I specifically authorize AK Steel Corporation to obtain information from my former employers and other references, and I authorize my former employers and other references to release information to AK Steel Corporation.

I agree that any false or misleading statement in this application for employment or any additional forms signed by me in connection with my employment shall be sufficient cause for refusal or termination of employment.

I understand that this application is not and is not intended to be a contract of employment. I agree to submit to a physical examination applicable to the requirements of the type of work for which I am applying, including drug and alcohol abuse screening.

Signature of Applicant *Marnie S. Carter*

*Suea Carter 11/2/2007*  
Application received by/Date received



## PRESENT OR MOST RECENT POSITION

Name of employer Intermet Armonta Iron Your title Coe processor, Fork lift  
Address 2520 3 st. Armonta Ohio 45638 Kind of business Foundry  
Describe your position Press coor. Transport skids and pallets on fork lift  
Period of employment from 5/94 to 1/2000 Name of person for whom you worked Robert Cline Rate of earnings 10.14 hr  
(MO/YR) (MO/YR)  
Give exact reason for leaving The plant shut down

## NEXT PREVIOUS POSITION

Name of employer Little Caesars Pizze Your title Day opener  
Address 502 4 st Armonta Ohio 45638 Kind of business Pizza Parlor  
Describe your position Opened the store and got it ready for business.  
Period of employment from 9/88 to 5/94 Name of person for whom you worked Vicki Lunn Rate of earnings 5.35 hr  
(MO/YR) (MO/YR)  
Give exact reason for leaving Advanced to higher paying job

## NEXT PREVIOUS POSITION

Name of employer \_\_\_\_\_ Your title \_\_\_\_\_  
Address \_\_\_\_\_ Kind of business \_\_\_\_\_  
Describe your position \_\_\_\_\_  
Period of employment from \_\_\_\_\_ to \_\_\_\_\_ Name of person for whom you worked \_\_\_\_\_ Rate of earnings \_\_\_\_\_  
(MO/YR) (MO/YR)  
Give exact reason for leaving \_\_\_\_\_

## NEXT PREVIOUS POSITION

Name of employer \_\_\_\_\_ Your title \_\_\_\_\_  
Address \_\_\_\_\_ Kind of business \_\_\_\_\_  
Describe your position \_\_\_\_\_  
Period of employment from \_\_\_\_\_ to \_\_\_\_\_ Name of person for whom you worked \_\_\_\_\_ Rate of earnings \_\_\_\_\_  
(MO/YR) (MO/YR)  
Give exact reason for leaving \_\_\_\_\_

How much time have you lost from work in the past two years? \_\_\_\_\_

For what particular type of work are you making application; e.g., clerical, technical, engineering, professional, sales, labor, etc.

Labor

Expected wage or salary \$ Starting pay

If applying for clerical work, list special skills. Include typing (wpm), word processing, computer software, and any office machines or equipment you can operate: \_\_\_\_\_

If applying for sales, technical, professional, or administrative work, give highlights of any special training or experience which may be helpful: \_\_\_\_\_

If applying for labor or craft work, indicate any training or experience which might be useful. Include any equipment or machinery you can operate: Fork lift training. Processor training.

Describe any additional qualifications, abilities, or strong points which will help you be successful in the job for which you are applying.

I am a good team worker with dedication and drive.

#### PERSONAL REFERENCES:

Please provide the following information on three individuals whom we may contact as references:

NAME	ADDRESS	TELEPHONE NO.	RELATIONSHIP
<u>Willa Mae Royal</u>	<u>906 8th. Sinton, Oh</u>	<u>(740) 532-8529</u>	<u>Neighbor</u>
<u>Myron Carter</u>	<u>809 9th. Sinton, Oh</u>	<u>(740) 532-8334</u>	<u>Cousin</u>
<u>Sue Birchfield</u>	<u>814 Adams St. Sinton, Oh</u>	<u>(740) 532-0577</u>	<u>friend</u>

I hereby certify that the foregoing information is accurate, and I authorize AK Steel to verify it. I specifically authorize AK Steel Corporation to obtain information from my former employers and other references, and I authorize my former employers and other references to release information to AK Steel Corporation.

I agree that any false or misleading statement in this application for employment or any additional forms signed by me in connection with my employment shall be sufficient cause for refusal or termination of employment.

I understand that this application is not and is not intended to be a contract of employment. I agree to submit to a physical examination applicable to the requirements of the type of work for which I am applying, including drug and alcohol abuse screening.

Signature of Applicant Morris S. Carter

Sue Carter 11/2/2007  
Application received by/Date received

## CHARGE OF DISCRIMINATION

AGENCY

CHARGE NUMBER

This form is affected by the Privacy Act of 1974; See Privacy Act Statement before completing this form.

☐ FEPA☒ EEOC

241A201039

Cincinnati Area Office

and EEOC

State or local Agency, if any

NAME (Indicate Mr., Ms., Mrs.)

Ms. Marnie Carter

HOME TELEPHONE (Include Area Code)

(740) 532-1733

STREET ADDRESS

CITY, STATE AND ZIP CODE

901 South Eighth St.

Ironton, OH 45638

DATE OF BIRTH

70

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (If more than one list below.)

NAME

AK Steel

NUMBER OF EMPLOYEES, MEMBERS

&gt;20

TELEPHONE (Include Area Code)

1-800-331-5050

STREET ADDRESS

CITY, STATE AND ZIP CODE

703 Curtis Street

Middletown, Ohio 45043

COUNTY

NAME

TELEPHONE NUMBER (Include Area Code)

(740) 532-1733

STREET ADDRESS

CITY, STATE AND ZIP CODE

901 So. 8th St.

Ironton, Ohio 45638

COUNTY

Lawrence

CAUSE OF DISCRIMINATION BASED ON (Check appropriate box(es))

☒ RACE☒ COLOR☐ SEX☐ RELIGION☐ AGE☐ RETALIATION☐ NATIONAL☐ DISABILITY☐ OTHER (Specify)

ORIGIN

DATE DISCRIMINATION TOOK PLACE  
EARLIEST (ADEA/EPA)

LATEST (ALL)

April 2002

☒ CONTINUING ACTION

THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)):

Race Discrimination

EXHIBIT

M. CARTER  
3 8.15.07  
SMB

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

NOTARY - (When necessary for State and Local Requirements)

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.

SIGNATURE OF COMPLAINANT

Marnie Carter

SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE  
(Day, month, and year)

I declare under penalty of perjury that the foregoing is true and correct.

Date

Charging Party (Signature)

**CHARGE OF DISCRIMINATION  
MARNIE CARTER  
PAGE 1**

**I. Overview of Individual and Class Allegations**

AK Steel Corporation has discriminated and continues to discriminate against me in the terms and conditions of my application for employment with them on the basis of my race, African-American, by denying me the opportunity to be hired while hiring equally or less qualified white employees and subjecting me to a racially hostile application process and other forms of discrimination. I believe that AK Steel Corporation's actions are part of a continuing pattern and practice of discrimination against African-American applicants for employment and employees, including but not limited to, denying applicants hiring opportunities while providing such opportunities to equally or less qualified white applicants and subjecting them to a racially hostile application process.

**II. Statement of Facts**

I applied to AK Steel in approximately January 2002 for a general labor position at their plant in Ashland, Kentucky. My work experience includes serving as a Forklift Operator at Ironton Iron Intermit, so I thought that I was well qualified to work in this capacity. In addition, I have no felony convictions and am drug-free. I found out about the position at a career fair in Portsmouth, Ohio at the Elks Club. An AK Steel representative there gave me an application, which I submitted at the AK Steel plant. A week later, they called to schedule me for a test given in the basement of the plant. The test asked logic, math, and general questions. I found the test to be relatively challenging and wondered why they were asking a lot of the questions because, based on my experience at Ironton Iron Intermit, much of the material tested seemed irrelevant to working in general labor. I thought that I did medium on it, well enough to have achieved a passing score. Approximately a week and a half later, I spoke with Susan Lester, an AK recruiter, on the phone. She told me that I had failed the test and refused to answer my questions or provide any further information about it.

**III. Statement of Discrimination**

I believe that AK Steel Corporation has discriminated against me and continues to discriminate against me in the terms and conditions of my applications for employment with them on the basis of my race, African-American, in violation of the Civil Rights Act of 1964, as amended, because white applicants with fewer qualifications than me have been hired and I have not, and because I have been subjected to a racially hostile application process and other forms of discrimination and denied the right to apply for work in an environment free of racial discrimination.

**CHARGE OF DISCRIMINATION  
MARNIE CARTER  
PAGE 2**

I have been adversely affected by these discriminatory practices by being deprived of the equal opportunity to be hired. Such discrimination denies me and other African-Americans the right to be hired for positions for which we are qualified.

This systemic discrimination also adversely affects the status of African-Americans as employees by promoting and reinforcing racial stereotypes and bias in hiring.

**IV. Statement of Classwide Discrimination on the Basis of Race**

Based on my experiences, I believe that AK Steel Corporation has engaged and continues to engage in a pattern and practice of discrimination against its African-American applicants for employment and employees that denies them equal employment opportunities in ways including but not limited to the following: denying them hiring opportunities while providing such opportunities to equally or less qualified white employees and subjecting them to a racially hostile application process and work environment in which few other African-Americans are employed. This policy violates Title VII of the 1964 Civil Rights Act, 42 U.S.C. Section 2000(e), et seq.

I believe this policy has effected a class of black persons comprised of all past, present and future black applicants for employment with AK Steel. I believe that these discriminatory practices occur throughout AK Steel Corporation. I make this charge on behalf of myself and all similarly situated African-American applicants for employment and employees.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 6/14/02

Martin Carter

Charging Party (signature)

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

**EXHIBIT**

VIVIAN BERT, *et al.*,

Plaintiffs,

v.

AK STEEL CORPORATION,

Defendant.

Case No. C-1-02-467  
Judge Beckwith  
Magistrate Judge Hogan

M. CARTER  
4 8.15.07  
pmB

**PLAINTIFFS' INITIAL DISCLOSURES**

Plaintiffs, through their counsel, submit the following disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure:

1. The name and, if known, the address and telephone number of each individual likely to have discoverable information relevant to disputed facts alleged with particularity in the pleading identifying the subjects of the information.

Lay Witnesses: See Attachment A.

Additional witnesses may include any of the Defendant's hiring personnel, management, or any other employees who have otherwise witnessed the violations alleged in Plaintiffs' complaint. Discovery is continuing and ongoing and Plaintiffs reserve the right to supplement this response as additional facts become available.

Expert Witnesses: At this time, expert witnesses are not identified. Plaintiffs' counsel will provide information pursuant to the Case Management Order in this case.



2. **A copy of, or a description by category and location of, all documents, data compilations, and tangible things in the possession, custody, or control of the party that are relevant to disputed facts alleged with particularity in the pleadings.**

See Attachment B.

Additional supporting documentation may include documentation in the possession of Defendants. Such documents may include any personnel files, postings, bids, manuals, notices, agreements, or other writings documenting the Plaintiffs' and putative class members' employment, applications for employment, and/or opportunities for advancement or lack thereof and Defendants' policies on discrimination and harassment.

Plaintiffs objects to the production of any documents which are protected by the attorney-client privilege or the work-product doctrine. Discovery is continuing and ongoing and Plaintiffs reserve the right to supplement this response as additional facts become available.

3. **A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.**

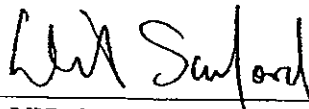
The actual nominal and punitive damage amounts are currently unknown and will be determined at a later date. This response will be supplemented as further information becomes available. In determining the amount of Plaintiffs' damages, Plaintiffs may need to rely upon information in the possession of the Defendant to be obtained during discovery, as well as the opinion of an expert or experts.

4. **For inspection and copying as under Rule 34 any insurance agreement under**

which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Not applicable to Plaintiffs.

Respectfully submitted this 3<sup>rd</sup> day of February, 2003.



DAVID SANFORD, D.C. Bar No. 457933  
ERIC BACHMAN, KY Bar. No. 88122  
**GORDON, SILBERMAN, WIGGINS & CHILDS, P.C.**  
7 DUPONT CIRCLE, N.W.  
SUITE 200  
WASHINGTON, D.C. 20036  
202-467-4123 / 202-467-4489 (facsimile)

GRANT MORRIS, Washington D.C. Bar No. 926253  
**LAW OFFICES OF GRANT MORRIS**  
7 DUPONT CIRCLE, N.W.  
SUITE 250  
WASHINGTON, D.C. 20036  
202-331-4707

PAUL H. TOBIAS, OH Bar No. 0032415  
DAVID D. KAMMER, OH Bar No. 0061808  
**TOBIAS, KRAUS & TORCHIA, LLP**  
414 WALNUT STREET  
SUITE 911  
CINCINNATI, OH 45202  
Telephone: (513) 241-8137  
Facsimile: (513) 241-7863

*Attorneys for Plaintiffs*

which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Not applicable to Plaintiffs.

Respectfully submitted this 3<sup>rd</sup> day of February, 2003.

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ERIC BACHMAN, KY Bar. No. 88122  
**GORDON, SILBERMAN, WIGGINS & CHILDS, P.C.**  
7 DUPONT CIRCLE, N.W.  
SUITE 200  
WASHINGTON, D.C. 20036  
202-467-4123 / 202-467-4489 (facsimile)

GRANT MORRIS, Washington D.C. Bar No. 926253  
**LAW OFFICES OF GRANT MORRIS**  
7 DUPONT CIRCLE, N.W.  
SUITE 250  
WASHINGTON, D.C. 20036  
202-331-4707

PAUL H. TOBIAS, OH Bar No. 0032415  
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**TOBIAS, KRAUS & TORCHIA, LLP**  
414 WALNUT STREET  
SUITE 911  
CINCINNATI, OH 45202  
Telephone: (513) 241-8137  
Facsimile: (513) 241-7863

*Attorneys for Plaintiffs*

**ATTACHMENT A****Lay Witness Testimony:<sup>1</sup>****1. Vivian Bert**

- a) Donna Phillips  
Oklahoma Department of Transportation  
200 N. E. 21st Street  
Oklahoma City, OK 73105

Phillips may have knowledge of Bert's character, qualifications, level of experience, and job performance.

- b) Clyde W. Thomas  
Oklahoma Department of Transportation  
200 N. E. 21st Street  
Oklahoma City, OK 73105

Thomas may have knowledge of Bert's character, qualifications, level of experience, and job performance.

**2. Thaddeus Freeman**

None at this time.

**3. Darrell Carter**

- a) Mark Collins  
223 9th Street  
Ashland, KY 4110

Collins may have information regarding race discrimination in hiring at AK Steel. He also may have knowledge of Carter's character, qualifications, and level of experience.

- b) Susan Lester  
AK Steel, HR Manager  
P.O. Box 191  
Ashland, KY 41105

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<sup>1</sup> Witnesses are listed according to the Plaintiff to whose claims they are believed to be most directly relevant. Plaintiffs reserve the right to take the position that such testimony is relevant to the claims of other Plaintiffs and/or the claims of the putative class.

Lester, an employee of the Defendant, may have information regarding Carter's application for employment with the AK Steel. Lester may also have information regarding race discrimination in hiring at AK Steel.

- c) Darlene Denise Carter  
908 South 8<sup>th</sup> St.  
Ironton, OH 45638

D. Carter may have information regarding race discrimination in hiring at AK Steel. He also may have knowledge of Carter's character, qualifications, and level of experience.

- d) Marnie Carter  
908 South 8<sup>th</sup> St.  
Ironton, OH 45638

M. Carter may have information regarding race discrimination in hiring at AK Steel. She also may have knowledge of Carter's character, qualifications, and level of experience.

4. Edward James Lewis

- a) Allen Roberts  
P.O. Box 552  
Middletown, OH 45044

Roberts may have information regarding race discrimination in hiring, promotions, training, and terms and conditions of employment at AK Steel. He also has knowledge of Lewis's character, qualifications, level of experience, and job performance.

5. Timothy Oliphant

None at this time.

6. Mary Harris

None at this time.

7. Roderique Russell

None at this time.

8. Kay Jackson

- a) Brooks Carmichael Jackson  
1223 Winifred St.  
Greenup, KY 41144

B. Jackson may have information regarding race discrimination in hiring, promotions, training, and terms and conditions of employment at AK Steel. He also has knowledge of Jackson's character, qualifications, level of experience, and job performance.

- b) Roger Grundman, Jr.  
Tenneco Packaging  
18 Peck Avenue  
P.O. Box 148  
Glens Falls, New York 12801-0148

Grundman may have knowledge of Jackson's character, qualifications, level of experience, and job performance.

- c) Mimi Louiso  
Tenneco Packaging  
9960 Raquet Club Lane  
Glen Allen, VA 23060

Louiso may have knowledge of Jackson's character, qualifications, level of experience, and job performance.

- d) Gary Hamm  
Tenneco Packaging/AVI  
300 Harris Road  
Wurtland, KY 41144

Hamm may have knowledge of Jackson's character, qualifications, level of experience, and job performance.

- e) Jackie Smith  
Tenneco Packaging/AVI  
300 Harris Road  
Wurtland, KY 41144

Smith may have knowledge of Jackson's character, qualifications, level of experience, and job performance.

- f) Garry R. Lewis  
Tenneco Packaging/AVI

300 Harris Road  
Wurtland, KY 41144

Lewis may have knowledge of Jackson's character, qualifications, level of experience, and job performance.

9. Marnie Carter

- a) Darrell Carter  
901 South 7th St.  
Ironton, OH 45638

Carter may have information regarding race discrimination in hiring at AK Steel. He also may have knowledge of Carter's character, qualifications, and level of experience.

- b) Darlene Denise Carter  
908 South 8<sup>th</sup> St.  
Ironton, OH 45638

D. Carter may have information regarding race discrimination in hiring at AK Steel. She also may have knowledge of Carter's character, qualifications, and level of experience.

- c) Susan Lester  
AK Steel, HR Manager  
P.O. Box 191  
Ashland, KY 41105

Lester, an employee of the Defendant, may have information regarding Carter's application for employment with the AK Steel. Lester may also have information regarding race discrimination in hiring at AK Steel.

10. Darlene Denise Carter

- a) Darrell Carter  
901 South 7th St.  
Ironton, OH 45638

Carter may have information regarding race discrimination in hiring at AK Steel. He also may have knowledge of Carter's character, qualifications, and level of experience.

- b) Marnie Carter  
908 South 8<sup>th</sup> St.



Ironton, OH 45638

M. Carter may have information regarding race discrimination in hiring at AK Steel. She also may have knowledge of Carter's character, qualifications, and level of experience.

- c) Susan Lester  
AK Steel, HR Manager  
P.O. Box 191  
Ashland, KY 41105

Lester, an employee of the Defendant, may have information regarding Carter's application for employment with the AK Steel. Lester may also have information regarding race discrimination in hiring at AK Steel.

11. Dwight Lewis

- a) Susan Lester  
AK Steel, HR Manager  
P.O. Box 191  
Ashland, KY 41105

Lester, an employee of the Defendant, may have information regarding Lewis's application for employment with the AK Steel. Lester may also have information regarding race discrimination in hiring at AK Steel.

12. Michael Miller

- a) Jessica Hicks

Hicks, an employee of the Defendant, may have information regarding Miller's application for employment with the AK Steel. Hicks may also have information regarding race discrimination in hiring at AK Steel.

- b) Ella Moreland  
Heidelberg Web Systems  
4900 Webster Street  
Dayton, Ohio 45414

Moreland may have knowledge of Miller's character, qualifications, level of experience, and job performance.

13. Ronald Sloan

a) Jessica Hicks

Hicks, an employee of the Defendant, may have information regarding Sloan's application for employment with the AK Steel. Hicks may also have information regarding race discrimination in hiring at AK Steel.

14. Donald Edwards

None at this time.

15. Shawn Pryor

None at this time.

16. Tiffany Jackson

a) Rodney Cosby  
1202 Winifred St.  
Greenup, KY 41144

Cosby may have information regarding race discrimination in hiring, promotions, training, and terms and conditions of employment at AK Steel. He also has knowledge of Jackson's character, qualifications, level of experience, and job performance.

b) Susan Lester  
AK Steel, HR Manager  
P.O. Box 191  
Ashland, KY 41105

Lester, an employee of the Defendant, may have information regarding Jackson's application for employment with the AK Steel. Lester may also have information regarding race discrimination in hiring at AK Steel.

c) Pat Amitrano  
Department of Public Works  
11 Wurtz Avenue  
Utica, NY 13502

Amitrano may have knowledge of Jackson's character, qualifications, level of experience, and job performance.

d) James Mack  
User Friendly Software Systems

239 Genesee Street  
Utica, NY 13502

Mack may have knowledge of Jackson's character, qualifications, level of experience, and job performance.

e) Brian Boyle  
Liebert Corporation  
3040 South 9th Street  
Ironton, OH 45638

Boyle may have knowledge of Jackson's character, qualifications, level of experience, and job performance.

17. Allen Roberts

None at this time.

**ATTACHMENT B**

## 1. Vivian Bert

Tax returns from 1999, 2000, and 2001  
Resume  
EEOC Charge  
Job application  
Notebook

## 2. Thaddeus Freeman

Tax returns from 1999, 2000 and 2001  
EEOC Charge  
Correspondence related to EEOC charge  
Resume

## 3. Darrell Carter

None at this time.

## 4. Edward James Lewis

None at this time.

## 5. Timothy Oliphant

None at this time.

## 6. Mary Harris

Tax returns from 1999, 2000 and 2001  
EEOC Charge  
Resume

## 7. Roderique Russell

None at this time.

## 8. Kay Jackson

W2 Wage and Tax Statements 1999, 2000, 2001  
EEOC Documents

Resume  
Letters of Recommendation  
Copies of prescriptions  
Notice of Dismissal  
Copy of high school diploma  
Copy of application to Shawnee Medical Center

9. Marnie Carter

None at this time.

10. Darlene Denise Carter

None at this time.

11. Dwight Lewis

Calender  
Tax Returns 1999, 2000, 2001  
Resume  
EEOC Charge and related Documents

12. Michael Miller

Tax Returns 2000, 2001  
Resume  
Transcript, Sinclair Community College, Associate of Applied Science  
Letter of Recommendation  
EEOC Charge and related Documents  
Work Force Reduction Notification, Heidelberg Web Systems

13. Ronald Sloan

Tax Returns: 1999, 2000, 2001  
EEOC charge  
Resumes  
Certificate of Discharge from Active Military Duty, Honorable  
Certificate regarding Naval Training and Experience  
cover letter  
electronics certificate

14. Donald Edwards

None at this time.

15. Shawn Pryor

W2 Wage and Tax Statements: 1999, 2000, 2001  
High School Diploma  
Dipoloma, Miami University of Ohio, BA

16. Tiffany Jackson

Tax Returns: 1999, 2000 and 2001  
EEOC Charge and Related Documents  
Resume  
Calendar notes  
Letters of reference  
Paralegal certificate  
Forklift certificate

17. Allen Roberts

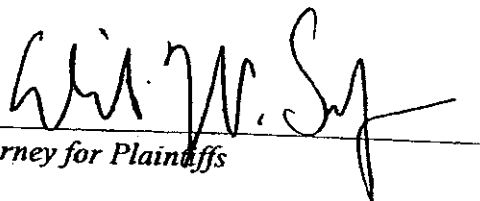
None at this time.\*

\*At present, Plaintiffs continue to review documents in the possession of Roberts and will supplement these initial disclosures as soon as practicable.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of Plaintiffs' Initial Disclosures was served this 3rd day of February, 2003, via facsimile and first-class mail, postage prepaid, upon:

ROGER A. WEBER  
TAFT, STETTINIUS & HOLLISTER LLP  
1800 FIRSTAR TOWER  
425 WALNUT STREET  
CINCINNATI, OH 452023959  
Telephone: (513) 381-2838  
Facsimile: (513) 381-0205

  
\_\_\_\_\_  
Attorney for Plaintiffs



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

**EXHIBIT**

M. CARTER  
5 8-15-07  
pmb

VIVIAN BERT, et al.,

Plaintiffs,

v.

AK STEEL CORPORATION,

Defendant.

CASE NO. C-1-02-467

Judge Beckwith

Magistrate Judge Hogan

**PLAINTIFF MARNIE CARTER'S RESPONSES TO**  
**DEFENDANT A. K. STEEL CORPORATION'S FIRST SET OF INTERROGATORIES**

Comes now the Plaintiff, Marnie Carter, by and through her undersigned counsel of record and responds to the Defendant's First Set of Interrogatories as follows:

**GENERAL OBJECTIONS**

1. The Plaintiff objects to the definitions and instructions accompanying these interrogatories to the extent that they seek to impose burdens, duties and obligations upon the Plaintiff in excess of or different from those imposed by applicable law and the Federal Rules of Civil Procedure; Plaintiff will respond in accordance with said law and rules.

2. The Plaintiff objects to these requests to the extent they seek information and/or documentation regarding matters about which the Defendant has knowledge but has failed to disclose, or so limited their responses to previous discovery of the Plaintiff, so as to in effect deny the Plaintiff the information requested and needed by them to answer these requests.

3. The Plaintiff objects to these requests to the extent they seek to discover "core" work product, including the disclosure of the mental impressions, conclusions, opinions, and/or legal theories of

attorneys or other representatives of the Plaintiff, rather than seeking this information from the Plaintiff.

4. The Plaintiff objects to these requests to the extent they seek information and/or documentation protected by the attorney-client privilege or any other applicable privilege.

5. The Plaintiff objects to these requests to the extent that the Defendant is seeking to make them into a bill of particulars.

6. The Plaintiff objects to these requests to the extent they seek to require Plaintiff's counsel to present a "dress rehearsal" of the evidence to be submitted in the course of the proceedings. The mental impressions, legal theories, legal conclusions, and legal opinions of Plaintiff's counsel, as well as any communications between Plaintiff and her counsel, are clearly protected from discovery by the attorney-client privilege and the work product doctrine.

7. The Plaintiff objects to these requests to the extent that the information and/or documentation sought, if any, was obtained and prepared in anticipation of litigation and the Defendants have not made the required showing of substantial need for the information and/or documentation or that the substantial equivalent of such information and/or documentation is unobtainable by other means. The Plaintiff further objects to these requests to the extent that the information and/or documentation called for, if any, is protected and is not discoverable under Rule 26(b)(3) of the Fed. R. Civ. P. and Hickman v. Taylor, 329 U.S. 495 (1947).

8. The Plaintiff objects to these requests to the extent that they seek information and/or documentation that is equally available to the Defendant and the burden on the Defendant to obtain the requested information and/or documentation is no greater than the burden on the Plaintiff.

9. The Plaintiff objects to these requests to the extent they exceed the requirements of Rules

26, 30, 34 or 45 of the Fed. R. Civ. P.

10. The Plaintiff objects to these requests to the extent they seek information and/or documentation relating to expert witnesses, witnesses, and trial exhibits in excess of the disclosure duties imposed by the Fed. R. Civ. P. and the Court's Scheduling and Pretrial Orders relating to such matters.

11. The Plaintiff objects to these requests to the extent they require the Plaintiff to disclose "each and every" fact or piece of knowledge possessed by them as such a requirement is impossible to fulfill and is objectionably broad for failure to be "reasonably particularized".

12. The Plaintiff objects to these requests to the extent they request duplicative and cumulative information and/or documentation heretofore disclosed in conjunction with discovery already undertaken by the Defendant in this action.

13. The Plaintiff objects to these requests to the extent that they seek to require the Plaintiff's attorneys to divulge the substance of information and/or documentation developed by them (i.e., interpretive, not investigatory) in preparation for any hearing or trial in this action.

14. The Plaintiff objects to these requests to the extent that they do not, on their face, restrict themselves either to an identifiable time or a reasonable, rationally-based time frame.

15. The Plaintiff objects to these requests to the extent that they seek information and/or documentation from the Plaintiff regarding matters about which the Defendant has refused or objected to providing in their interrogatory or request for production responses.

16. The Plaintiff objects to these requests to the extent that they are oppressive, i.e., they were designed to create an unreasonable burden on the Plaintiff which burden is not commensurate with the professed result sought.

17. The Plaintiff objects to these interrogatories to the extent they seek answers to multiple interrogatories within a single interrogatory.

18. These requests are addressed to the Plaintiff and the responses herein are based on information and/or documentation presently available to the Plaintiff. Investigation is presently continuing, however, and additional information and/or documentation pertinent to these requests may well be disclosed as a result of such ongoing and continuing investigation.

Except as otherwise indicated, the Plaintiff incorporates the General Objections into each and every answer set forth below. Without waiving the foregoing objections, the Plaintiff answers as follows:

**INTERROGATORY NO. 1:** Identify all litigation or legal proceedings in which you have been a witness or party, including the name and number of the case, the court or administrative agency for which the case was pending, and a brief description of the nature of the case, and the year in which the matter was pending.

**SPECIFIC OBJECTION TO REQUEST:** Plaintiff objects because this request does not seek relevant information or that information subject to production under Fed. R. Civ. P. 26, and thus, this request is unduly harassing, burdensome, and oppressive. Subject to and without waiving the foregoing general and specific objections, Plaintiff responds as follows:

**ANSWER:** Bert, et al, v. AK Steel  
Case No.: 1:02-CV-00467  
United States District Court  
Southern District of Ohio (Cincinnati)  
Nature of case: Race discrimination in hiring

**INTERROGATORY NO. 2:** Identify all employers for whom you have worked since January 1, 2001, including the dates of employment, the positions held, amounts paid per week, and reason for

leaving, if applicable.

**SPECIFIC OBJECTION TO REQUEST:** Plaintiff objects because this request does not seek relevant information or that information subject to production under Fed. R. Civ. P. 26, and thus, this request is unduly harassing, burdensome, and oppressive. Subject to and without waiving the foregoing general and specific objections, Plaintiff responds as follows:

**ANSWER:** 9-5-02 to 1-13-03: Applied Card Systems as a collector, \$212.50 per week, they shut down the business;

4-9-04 to 8-1-04: Bryants Health Care as a Nurse Aide, \$536.00 bi-weekly, was laid off;

8-9-04 to 11-1-04: Oak Ridge Treatment Center as a Mental Health Specialist - \$250.00 per week; went back to Bryants Health Care.

11-1-04 to the Present: Bryants Health Care as a Nurse Aide - \$536.00 bi-weekly

**INTERROGATORY NO. 3:** Identify all employers to whom you applied for employment since January 1, 2001, including the date you submitted written applications, the job to which you applied, the dates you were interviewed, the employers who tendered you job offers, and a description of the offer.

**SPECIFIC OBJECTION TO REQUEST:** Plaintiff objects because this request does not seek relevant information or that information subject to production under Fed. R. Civ. P. 26, and thus, this request is unduly harassing, burdensome, and oppressive. Subject to and without waiving the foregoing general and specific objections, Plaintiff responds as follows:

**ANSWER:** I have applied to A. K. Steel Corporation and the employers listed in my response to Interrogatory No. 2.

**INTERROGATORY NO. 4:** Identify all income received from whatever source, by amount each week after January 1, 2001.

**ANSWER:** Please see my response to Interrogatory No. 2.

**INTERROGATORY NO. 5:** Identify by name, address and telephone number all individuals who have knowledge about or information about the allegations in the Complaint, and state a summary of what you believe their knowledge to be.

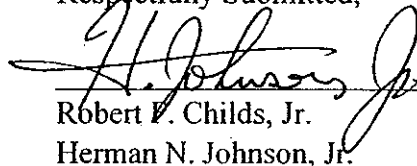
**ANSWER:** Darlene Carter at 908 S. 8<sup>th</sup> Street, Ironton, Ohio and Darrell Carter at 901 South 7<sup>th</sup> Street, Ironton, Ohio

**INTERROGATORY NO. 6:** Identify all individuals who you intend to call as witnesses in the litigation of this matter.

**SPECIFIC OBJECTION TO REQUEST:** Plaintiffs objects because this Interrogatory violates the Court's Order establishing a deadline for Plaintiff to disclose witnesses and testimony. Plaintiff further objects to the extent this interrogatory seeks information protected by the attorney-client privilege or other privilege and/or the work product doctrine. Subject to and without waiving the foregoing general and specific objections, Plaintiff responds as follows:

**ANSWER:** Plaintiff will abide by the deadlines established by the Court and the disclosure requirements set by the Federal Rules of Civil Procedure to disclose the witnesses they will use at trial in this case.

Respectfully Submitted,

  
Robert V. Childs, Jr.  
Herman N. Johnson, Jr.

**WIGGINS, CHILDS, QUINN & PANTAZIS**

The Kress Building  
301 19<sup>th</sup> Street North  
Birmingham, Alabama 35203  
(205) 328-0640  
(205) 254-1500 (facsimile)

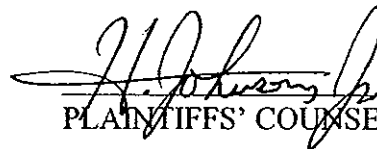
Tobias, Kraus & Torchia, LLP  
414 Walnut Street  
Suite 911  
Cincinnati, Ohio 45202  
(513) 241-8137  
(513) 241-7863 (facsimile)

ATTORNEYS FOR THE PLAINTIFFS

**CERTIFICATE OF SERVICE**

I do hereby certify that on May 10, 2007, I served the foregoing via U.S. Mail and electronic mail upon the following:

Gregory Parker Rogers  
Lawrence James Barty  
Patricia Anderson Pryor  
Taft, Stettinius & Hollister, LLP  
1800 First Star Tower  
425 Walnut Street  
Cincinnati, OH 45202  
Fax: (513) 381-0205

  
PLAINTIFFS' COUNSEL



VERIFICATION

I, Marnie Carter, hereby state that the answers to the foregoing interrogatories are true and complete to the best of my knowledge.

Marnie Carter  
Marnie Carter

This the 7 day of May, 2007.

MARNIE D CARTER

	2000	1999
<b>INCOME</b>		
7. Wages, salaries, tips.....	2,132	23,722
8a. Taxable interest income.....	0	0
9. Ordinary dividend income.....	0	0
10. State/local tax refunds.....	0	0
11. Alimony received.....	0	0
12. Business income (loss).....	0	0
13. Capital gain (loss).....	0	0
14. Other gains (losses).....	0	0
15b. Taxable IRA dist.....	0	0
16b. Taxable pensions.....	0	0
17. Rents, partnerships, etc.....	0	0
18. Farm income (loss).....	0	0
19. Unemployment comp.....	2,448	0
20b. Taxable soc.security.....	0	0
21. Other income.....	0	0
22. Total income.....	4,580	23,722
<b>ADJUSTMENTS</b>		
23. IRA deduction.....	0	0
24. Student loan interest deduction.....	0	0
25. Medical Savings deduction.....	0	0
26. Moving Expense.....	0	0
27. Self-empl.tax deduct.....	0	0
28. Self-empl.health ins.....	0	0
29. KEOGHs, SEPs, and SIMPLEs.....	0	0
30. Sav.withdrawal penalty.....	0	0
31a. Alimony paid.....	0	0
32. Total adjustments.....	0	0
<b>ADJUSTED GROSS INCOME</b>		
33. Line 22 less line 32.....	4,580	23,722
<b>TAXABLE INCOME</b>		
36. Itemized deductions.....	0	0
Medical expenses.....	81	964
Taxes.....	0	0
Deductible interest.....	0	0
Contributions.....	0	0
Casualty.....	0	0
Miscellaneous deduct.....	81	964
Total itemized.....	6,450	4,300
36. Standard deduction.....	5,600	2,750
38. Exemptions.....	0	16,672
39. Taxable income.....		
<b>TAX COMPUTATION</b>		
Tax from Tax Table (00).....	0	2,501
Additional taxes.....	0	0
41. Alt.minimum tax.....	0	0
42. Tax before credits.....	0	2,501
<b>CREDITS</b>		
43. Foreign tax credit.....	0	0
44. Child care.....	0	0
45. Elderly or the disabled.....	0	0
46. Education credits.....	0	0
47. Child tax credit.....	0	0

Name **MARNIE D CARTER**

Social Security Number

INCOME and ADJUSTMENTS		Year 2001	Year 2000
7.	Wages, salaries, tips	0	2,132
8a.	Taxable interest income	0	0
9.	Ordinary dividend income	0	0
10.	State/local tax refunds	0	0
11.	Alimony received	0	0
12.	Business income (loss)	0	0
13.	Capital gain (loss)	0	0
14.	Other gains (losses)	0	0
15b.	Taxable IRA distribution	0	0
16b.	Taxable pensions	0	2,387
17.	Rents, partnerships, etc.	0	0
18.	Farm income (loss)	0	0
19.	Unemployment compensation	13,872	2,448
20b.	Taxable social security benefits	0	0
21.	Other income	0	0
22.	Total income	13,872	6,967
23.	IRA deduction	0	0
24.	Student loan interest deduction	0	0
25-31.	Other adjustments	0	0
32.	Total adjustments	0	0
33.	Line 22 less Line 32	13,872	6,967
<b>TAXABLE INCOME</b>			
36.	Itemized deductions		
	Medical expenses	0	0
	Taxes	0	81
	Deductible interest	0	0
	Contributions	0	0
	Casualty	0	0
	Miscellaneous deductions	0	0
	Total itemized deductions	0	81
36.	Standard deduction	6,650	6,450
38.	Exemptions	5,800	5,600
39.	Taxable income	1,422	0
<b>CREDITS</b>			
42.	Tax before credits	212	0
44.	Child care credit	0	0
46.	Education credits	0	0
43, 45, 48-49.	Other credits	71	0
48.	Child tax credit	141	0
51.	Total credits	212	0
52.	Tax after credits	0	0
53.	Self-employment tax	0	0
54.	Social security tax on tips	0	0
55.	Tax on IRA and other plans	0	239
56-57.	Other taxes	0	0
58.	Total tax	0	239
<b>PAYMENTS</b>			
59.	Federal withholding	1,811	1,153
60.	Estimated payments	0	0
61a.	Earned income credit	0	723
62, 64, 65.	Other payments	0	0
63.	Additional child tax credit	0	0
66.	Total payments	1,811	1,876
<b>REFUND</b>			
67.	Overpayment	1,811	1,637
68a.	Refund due after amount applied to next year's estimates	1,811	1,637
<b>AMOUNT DUE</b>			
70.	Amount owed with return	0	0
71.	Penalty for underpayment of tax	0	0

H&amp;R Block

advantage

**2003 Tax Return Summary****Federal Year over Year Comparison**

<b>INCOME</b>	<b>Year 2003</b>	<b>Year 2002</b>	<b>Change(\$)</b>
Wages, salaries, tips	\$6,150	\$4,329	\$1,821
Unemployment compensation	\$2,160	\$7,072	(\$4,912)
Total income	\$8,310	\$11,401	(\$3,091)

**ADJUSTED GROSS INCOME**

Total income less total adjustments	\$8,310	\$11,401	(\$3,091)
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**PAYMENTS**

Federal withholding	\$394	\$708	(\$314)
Earned income credit	\$2,100	\$1,471	\$629
Total payments	\$2,494	\$2,179	\$315

**REFUND**

Overpayment	\$2,494	\$2,179	\$315
Refund due	\$2,494	\$2,179	\$315

**OTHER COMPUTATIONS**

Alternative minimum taxable income	\$8,310	\$11,401	(\$3,091)
Effective tax bracket	0%		
Filing status	Head of Household	Head of Household	

**H&R Block****H&R BLOCK****ADVANTAGE****2005 Tax Return Summary****Federal Year over Year Comparison**

<b>INCOME</b>	<b>Year 2005</b>	<b>Year 2004</b>	<b>Change(\$)</b>
Wages, salaries, tips	\$16,519	\$9,361	\$7,158
Unemployment compensation	\$0	\$141	(\$141)
Total income	\$16,519	\$9,502	\$7,017
<b>ADJUSTED GROSS INCOME</b>			
Total income less total adjustments	\$16,519	\$9,502	\$7,017
<b>TAXABLE INCOME</b>			
Standard deductions	\$7,300	\$7,150	\$150
Exemptions	\$6,400	\$6,200	\$200
Taxable income	\$2,819	\$0	\$2,819
<b>TAX COMPUTATION</b>			
Income tax	\$281	\$0	\$281
Tax before credits	\$281	\$0	\$281
<b>CREDITS</b>			
Child care credit	\$281	\$0	\$281
Total credits	\$281	\$0	\$281
<b>PAYMENTS</b>			
Federal withholding	\$1,340	\$552	\$788
Earned income credit	\$2,318	\$2,604	(\$286)
Additional child tax credit	\$828	\$0	\$828
Total payments	\$4,486	\$3,156	\$1,330
<b>REFUND</b>			
Overpayment	\$4,486	\$3,156	\$1,330
Refund due	\$4,486	\$3,156	\$1,330
<b>OTHER COMPUTATIONS</b>			
Alternative minimum taxable income	\$16,519	\$9,502	\$7,017
Marginal tax bracket	10%		
Filing status	Head of Household	Head of Household	

An H&R Block Tax Professional is available year-round to provide you with information about these opportunities. For more information about tax, mortgage and financial services call 1-800-HRBLOCK or visit [hrblock.com](http://hrblock.com).

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